

U.S. Department of Justice

United States Attorney Southern District of New York

MEMO ENDORSED

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 1, 2020

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 The June 4 status conference is adjourned to July 24, 2020, at 10:30 a.m. Speedy trial time is excluded from June 4, 2020, until July 24, 2020, in the interest of justice.

SO ORDERED.

Edgardo Ramos, U.S.D.J Dated: 6/2/2020
New York, New York

Re: United States v. Raul Polanco and Juan Dutan, 19-cr-930 (ER)

Dear Judge Ramos:

On March 17, 2020, the parties wrote to the Court with a status update and requested adjournment of the status conference scheduled for March 18, 2020 in light of concerns regarding COVID-19 and access by counsel to incarcerated clients to review discovery. The Court granted the parties' request and adjourned the status conference until April 23, 2020. For the same reasons, the parties sought an adjournment of the April 23, 2020 status conference, which the Court also granted. Given the ongoing health crisis, the parties jointly request a third adjournment of approximately 45 days of the status conference currently scheduled for June 4, 2020.

Should the Court grant the parties' joint adjournment request, the Government moves that time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161, from June 4, 2020 until the date of rescheduled status conference, to allow for the defendants to continue to review discovery and for the parties to continue discussing potential dispositions. Defense counsel consent to the exclusion of time.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

hv:

Emily A. Johnson / Dominic A. Gentile Assistant United States Attorneys (212) 637-2409 / 2567

cc: Telesforo del Valle, Esq. (by ECF) Rudy Velez, Esq. (by ECF)